

Derek W. Loeser (admitted *pro hac vice*)
KELLER ROHRBACK L.L.P.
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Tel.: (206) 623-1900
Fax: (206) 623-3384
dloeser@kellerrohrback.com

Lesley E. Weaver (SBN 191305)
BLEICHMAR FONTI & AULD LLP
555 12th Street, Suite 1600
Oakland, CA 94607
Tel.: (415) 445-4003
Fax: (415) 445-4020
lweaver@bfalaw.com

Plaintiffs' Co-Lead Counsel

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**DECLARATION OF LESLEY E.
WEAVER IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

Judge: Hon. Vince Chhabria
Special Master Daniel Garrie
Courtroom: 4, 17th Floor

I, Lesley E. Weaver, declare and state as follows:

1. I am Partner-in-Charge of the California office of Bleichmar Fonti & Auld LLP, head of its consumer and antitrust practice, and co-lead counsel to plaintiffs in *In re: Facebook, Inc. Consumer Privacy User Profile Litigation*, No. 18-md-02843-VC (N.D. Cal.). I am a member in good standing of the bar of the State of California and of the United States District Court for the Northern District of California.

2. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them.

3. This declaration is made in support of the Plaintiffs' Administrative Motion To Consider Whether Another Party's Material Should Be Sealed.

4. True and correct copies of the following documents are attached as follows:

- (1) A true and correct **unredacted** copy of Plaintiffs' Supplemental Brief in Support of Sanctions is attached hereto.
- (2) A true and correct **unredacted** copy of Declaration of Lesley E. Weaver in Support of Plaintiffs' Supplemental Brief in Support of Sanctions is attached hereto.
- (3) True and correct **unredacted** copies of Exhibits 89–98, 100–134, and 136–139 to the Declaration of Lesley E. Weaver are attached hereto.
- (4) A true and correct **unredacted** copy of the Declaration of Cari C. Laufenberg and Matthew S. Melamed in Support of Plaintiffs' Supplemental Brief in Support of Sanctions is attached hereto.
- (5) A true and correct **unredacted** copy of Declaration of David J. Ko in Support of Plaintiffs' Motion for Sanctions is attached hereto.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 8th day of August, 2022 in Oakland, California.

Dated: August 8, 2022

By: /s/ Lesley E. Weaver
Lesley E. Weaver